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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215566
Party	Defendant Springbot, LLC
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Ann K. Ford/
Date	02/26/2015
Attachments	SPRINGBOT Opposition -- Consented Motion to Extend.pdf(28459 bytes)

In the matter of Service Mark
Application Serial No. 85/871,678
Mark: SPRINGBOT
Filed: March 8, 2013
Published: September 24, 2013

Applicant.

Opposition No. 91215566

Commissioner for Trademarks
Post Office Box 1451
Alexandria, Virginia 22313-1451

Springbot, LLC (“Applicant”), by and through the undersigned counsel, together with Opposer Bottle Rocket Corp. (“Opposer”), submit this Consented Motion for a Ninety-Day Extension of the Close of the Discovery Period and Re-Set All Remaining Case Deadlines with the Trademark Trial and Appeal Board (“Board”), respectfully requesting that the Board grant an extension of time through and including May 28, 2015 for the Close of the Discovery Period, and that all subsequent case deadlines be re-set by ninety days, pursuant to TBMP § 509.01.

The new case deadlines would be as follows:

Discovery Period to Close:	May 28, 2015
Plaintiff Pretrial Disclosures:	July 12, 2015
Plaintiff's 30-Day Trial Period Ends:	August 26, 2015
Defendant's Pretrial Disclosures:	September 10, 2015
Defendant's 30-Day Trial Period Ends:	October 25, 2015
Plaintiff's Rebuttal Disclosures:	November 9, 2015
Plaintiff's 15-Day Rebuttal Period Ends:	December 9, 2015

The deadline for the Close of the Discovery Period is February 27, 2015. The Parties have engaged in written discovery, and additional time is needed for the Parties to complete discovery. On February 26, 2015, Applicant secured the express consent of Opposer, as confirmed by its attorney Linda S. McAleer, to this Consented Motion and for the extension requested herein.

The Parties respectfully submit that this Consented Motion is not made for the purpose of unduly delaying proceedings before the Board.

WHEREFORE, in light of the foregoing, the Parties have shown good cause as to why the instant Consented Motion should be granted. As such, the Parties request that further appropriate action be taken in these proceedings, including the granting of an extension of the deadline for the Close of the Discovery Period through and including May 28, 2015, and that all subsequent case deadlines be re-set by ninety days accordingly.

Respectfully submitted,

Dated: February 26, 2015

By: /s/ John M. Nading
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **CONSENTED MOTION FOR A NINETY-DAY EXTENSION OF THE CLOSE OF THE DISCOVERY PERIOD AND RE-SET ALL REMAINING CASE DEADLINES** was served via electronic mail, as agreed to by the Parties, to Opposer's counsel of record:

Linda S. McAleer
The Law Offices of Linda S. McAleer
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this 26th day of February, 2015.

/s/ John M. Nading

John M. Nading
Attorney for Applicant